



March 12, 2010

Board of Building Regulations & Standards  
One Ashburton Place  
Room 1301  
Boston, MA 02108  
Attn: Mike Guigli

**Re: NAIOP Support for 780 CMR 8th Edition**

Dear Board Members:

NAIOP Massachusetts, the Commercial Real Estate Development Association, would like to record its strong support for the draft 780 CMR 8th Edition. NAIOP applauds the Board of Building Regulations & Standards for recognizing the need for a streamlined and efficient code.

By eliminating many of the unnecessary and costly Massachusetts specific provisions contained in previous versions of the state building code, the Commonwealth will now follow the model 2009 International Building Code (IBC) already in use in many states. Since there is no technical basis for many of these "unique to Massachusetts" requirements contained in past editions, we support the Board's decision to adopt the IBC-based 8<sup>th</sup> edition.

NAIOP would also like to express its support for an amendment to the code proposed by Eric Cote. The amendment would delete the proposed new Section 909.20.5.1. Deleting this section would align the smokeproof enclosure and stair pressurization requirements in the 8th edition of 780 CMR with the 2009 IBC. Again, since there is no technical reason for requiring that one smokeproof enclosure be provided in fully sprinklered high-rise buildings (in favor of pressurization) then we see no reason why this "unique to Massachusetts" section should be included.

**We strongly urge the Board to adopt the 8<sup>th</sup> edition with the suggested amendment.**

NAIOP represents the interests of more than 1400 members involved with the development, ownership, management, and financing of more than 145 million square feet of office, research & development, industrial, mixed use, and retail space in the Commonwealth. Thank you for the opportunity to provide comments.

Sincerely,  
**NAIOP Massachusetts**

A handwritten signature in black ink that reads "Tamara C. Small".

Tamara C. Small  
Director of Policy & Public Affairs